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**Federal Communications Commission  
in re: RM-10352**

**Comments from an affected party**

The proposal of Briggs and Tippet to separate wideband and narrow band modes has merit in its intent. However, the underlying ARRL bandplan is flawed.

By recommending 1800-1810 for digital modes, including narrowband modes like Psk31, the ARRL limits, if not prevents, international communications by those modes. Several European nations allocate 1810-1830 for amateur use. This is not reflected in the IARU bandplans, which were relied upon for international harmonization, by the ARRL bandplan study group.

Since much of the motivation for the bandplan was to keep PSK out of the “weak signal” window at 1830-1840, the oversight is understandable.

Should you be inclined to adopt RM-10352, I recommend a simple remedy:  
Define the band 1800-1815 for digital modes and CW.

I suggest, instead, that you reject RM-10352 without prejudice, and remand it to the ARRL for additional input, and later resubmission. Briggs and Tippet seek to separate SSB from CW, to maximize potential for international weak signal work.

I submit that this effort would be optimized, if a LISTEN ONLY window for cw were defined. By separating US domestic signals from weak distant ones in frequency space, channel-contention is substantially reduced. 1825-1830 might be appropriate for this use, as it appears to harmonize with most international allocations.

Thank you for your consideration.

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